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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re:

PURDUE PHARMA L.P., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**DECLARATION OF MICHAEL S. QUINN**

I, Michael S. Quinn, am a member of Eisenberg & Baum, LLP, counsel to the Ad Hoc Committee on Accountability (the “**Ad Hoc Committee**”) in this matter. I declare the following under penalty of perjury:

1. Annexed hereto as **Exhibit 1** is a true and correct copy of the Deferred Prosecution Agreement in *U.S. v. Practice Fusion, Inc.*, No. 2:20-cr-11 (D. Vt. Jan. 27, 2020), which is publicly available at <https://www.justice.gov/usao-vt/press-release/file/1239586/download>.

2. Annexed hereto as **Exhibit 2** is a true and correct copy of the Information (Exhibit B) to the Deferred Prosecution Agreement in *U.S. v. Practice Fusion, Inc.*, No. 2:20-cr-

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<sup>1</sup> The debtors in these chapter 11 cases (“**Debtors**” or “**Purdue**”), along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014) (collectively, the “**Bankruptcy Cases**”).

11 (D. Vt. Jan. 27, 2020), which is publicly available at <https://www.justice.gov/usao-vt/press-release/file/1239581/download>.

3. Annexed hereto as **Exhibit 3** is a true and correct copy of the Statement of Facts (Exhibit C) to the Deferred Prosecution Agreement in *U.S. v. Practice Fusion, Inc.*, No. 2:20-cr-11 (D. Vt. Jan. 27, 2020), which is publicly available at <https://www.justice.gov/usao-vt/press-release/file/1239606/download>.

4. Annexed hereto as **Exhibit 4** is a true and correct copy of the U.S. Department of Justice's Press Release entitled "Electronic Health Records Vendor To Pay Largest Criminal Fine in Vermont History and a Total of \$145 Million to Resolve Criminal and Civil Investigations," which is publicly available at <https://www.justice.gov/usao-vt/pr/electronic-health-records-vendor-pay-largest-criminal-fine-vermont-history-and-total-145>.

5. Annexed hereto as **Exhibit 5** is a true and correct copy of the U.S. Department of Justice's Press Release related to the public repository of documents related to Practice Fusion's kickback scheme, which is publicly available at <https://www.justice.gov/usao-vt/pr/public-repository-documents-relating-practice-fusion-inc-s-resolution-conspiracy-and>. The public repository is available at <https://www.pfdatabasedistrictofvermontsettlement.net/>.

6. Annexed hereto as **Exhibit 6** is a true and correct copy of Seven Days article entitled "Criminal Conspiracy Alleged by Vermont Prosecutors Involved Purdue Pharma," which is publicly available at <https://www.sevendaysvt.com/OffMessage/archives/2020/01/28/vermont-prosecutors-allege-criminal-conspiracy-involved-purdue-pharma>.

7. Annexed hereto as **Exhibit 7** is a true and correct copy of a Stat News article entitled "Without Oversight, electronic prescribing can harm patients," which is publicly available

at <https://www.statnews.com/2020/02/18/without-oversight-electronic-prescribing-can-harm-patients/>.

8. Annexed hereto as **Exhibit 8** is a true and correct copy of a Reuters article entitled “EXCLUSIVE-Oxycontin maker Purdue is ‘Pharma Co X’ in U.S. Opioid Kickback Probe-Sources,” which is publicly available at <https://finance.yahoo.com/news/exclusive-oxycontin-maker-purdue-pharma-213525076.html>.

9. Annexed hereto as **Exhibit 9** is a true and correct copy of a Practice Fusion email dated April 22, 2015, which is also available at PDFPA00000438 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

10. Annexed hereto as **Exhibit 10** is a true and correct copy of a Practice Fusion Master Services Agreement dated April 1, 2013, which is also available at PDFPA00000803 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

11. Annexed hereto as **Exhibit 11** is a true and correct copy of a Practice Fusion proposal for Pharma Co. X entitled “Therapy, Treatment Pattern & Outcomes,” which is also available at PDFPA00001790 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

12. Annexed hereto as **Exhibit 12** is a true and correct copy of a Practice Fusion Return on Investment spreadsheet, which is also available at PDFPA00001836 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

13. Annexed hereto as **Exhibit 13** is a true and correct copy of Practice Fusion emails from March 2015, which are also available at PDFPA00001904 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

14. Annexed hereto as **Exhibit 14** is a true and correct copy of Practice Fusion emails from April 2014, which are also available at PDFPA00002700 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

15. Annexed hereto as **Exhibit 15** is a true and correct copy of a Practice Fusion proposal for Pharma Co. X entitled “Real World Evidence: Extended Release Opioids,” which is also available at PDFPA00003208 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

16. Annexed hereto as **Exhibit 16** is a true and correct copy of Practice Fusion emails from July 2015, which is also available at PDFPA00004208 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

17. Annexed hereto as **Exhibit 17** is a true and correct copy of a Practice Fusion email dated September 2, 2015, which is also available at PDFPA00004215 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

18. Annexed hereto as **Exhibit 18** is a true and correct copy of a Practice Fusion email dated September 15, 2015, which is also available at PDFPA00004448 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

19. Annexed hereto as **Exhibit 19** is a true and correct copy of Practice Fusion emails from March 2016, which is also available at PDFPA00004514 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

20. Annexed hereto as **Exhibit 20** is a true and correct copy of a Practice Fusion emailed dated July 28, 2016, which is also available at PDFPA00004624 in the public repository of documents: <https://www.pfdatabasedistrictofvermontsettlement.net/>.

21. Annexed hereto as **Exhibit 21** is a true and correct copy of presentation materials related to a presentation entitled “Reach and Impact of an EHR Pain Care Decision Support Program.”

22. Annexed hereto as **Exhibit 22** is a true and correct copy of session details related to the presentation entitled “Reach and Impact of an EHR Pain Care Decision Support Program.”

23. Annexed hereto as **Exhibit 23** is a true and correct copy of a summary for the presentation entitled “Reach and Impact of an EHR Pain Care Decision Support Program.”

Dated: May 28, 2020  
New York, NY

Respectfully Submitted,

Eisenberg & Baum, LLP

By: /s/ Michael S. Quinn  
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